

IN THE DISTRICT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

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2013 SEP -6 A 11:42

UNITED STATES OF AMERICA

Plaintiff,

V.

GORDON L HALL

Defendant.

GORDON L HALL

Petitioner,

and

UNITED STATES OF AMERICA

Respondent.

CASE NO. 6:13-cr-00170-JMC-1

MOTION FOR DEFAULT JUDGMENT

The Defendant/Petitioner, GORDON L HALL, by and through the undersigned, hereby moves that the Court enter a default judgment in the above-captioned matter against the Plaintiff/Respondent, UNITED STATES OF AMERICA, and further moves:

- 1) That the Court enforce the FINAL EXPRESSION OF AGREEMENT IN A RECORD (ECF # 44) issued to the UNITED STATES OF AMERICA, require complete compliance with the FINAL EXPRESSION OF AGREEMENT IN A RECORD, direct the UNITED STATES OF AMERICA to obey the FINAL EXPRESSION OF AGREEMENT IN A RECORD served upon the UNITED STATES OF AMERICA, and order the UNITED STATES OF AMERICA's attendance and testimony and the production of the dismissal of the Defendant/Petitioner, GORDON L HALL, in Civil Case #: 8:12-cv-02078-JMC, Criminal Case #: 6:13-cr-00170-JMC-1, and including but

not limited to all derivative actions derived from said Civil Case, release all assets seized from the UNITED STATES DEPARTMENT OF JUSTICE FEDERAL BUREAU OF INVESTIGATION other than the assets pursuant to said FINAL EXPRESSION OF AGREEMENT IN A RECORD required by the terms of the Tender (ECF # 42) and FINAL EXPRESSION OF AGREEMENT IN A RECORD before the Defendant/Petitioner, GORDON L HALL, or Gordon LeRoy Hall, Private Unenfranchised Individual, and to release the Defendant/Petitioner, GORDON L HALL, from confinement, at such time as may be fixed by the Court;

- 2) That the Court enter a final judgment and enforcement order; and
- 3) That the Court grant such other and further relief as is just and proper.

Respectfully submitted *nunc pro tunc* to the 15th day of August, 2013.

GORDON L HALL

By: _____

Gordon LeRoy Hall

Private Unenfranchised Individual